

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

PAUL STRAIGHT,)	
)	
Plaintiff,)	
)	CASE NO. 2:20-CV-6551
vs.)	
)	
LG CHEM LTD., et al.)	Judge James L. Graham
)	Magistrate Judge Elizabeth P. Deavers
Defendants.)	
)	
)	
)	

**DEFENDANT LG CHEM, LTD.’S RESPONSE TO PLAINTIFF’S
NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiff recently submitted two Notices of Supplemental Authority citing out-of-state cases in further support of Plaintiff’s opposition to Defendant LG Chem, Ltd.’s (“LG Chem”) Motion to Dismiss for lack of personal jurisdiction (ECF No. 28).

If the Court is inclined to consider those authorities, none of which addressed LG Chem’s contacts with Ohio, then LG Chem requests the opportunity to submit supplemental briefing regarding Plaintiff’s supplemental authorities or to address them at oral argument. In addition, if the Court is going to consider Plaintiff’s supplemental authorities, LG Chem also respectfully submits the following additional authorities (which are also out-of-state authorities that do not address LG Chem’s contacts with Ohio):

- *Richter v. LG Chem, Ltd.*, No. 18 CV 50360, 2022 WL 5240583 (N.D. Ill. Sept. 27, 2022). A copy of the order is attached as **Exhibit A**.
- *LG Chem, Ltd. v. Superior Ct. of San Diego Cnty.*, 80 Cal. App. 5th 348, 295 Cal. Rptr. 3d 661 (2022) (*Lawhon*). A copy of the opinion is attached as **Exhibit B**.

- *Bullock v. Otto Imports, LLC et al.*, No. 4:19-cv-149, 2022 WL 949914 (W.D. Ky. Mar. 29, 2022). A copy of the order is attached as **Exhibit C**.

Dated this 4th day of November 2022.

Respectfully submitted,

/s/ Melissa Foster Bird

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on this 4th day of November 2022, the foregoing **DEFENDANT LG CHEM, LTD.'S RESPONSE TO PLAINTIFF'S NOTICE OF SUPPLEMENTAL AUTHORITY** was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to these attorneys of record:

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